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Attorney for Defendant Dick's Sporting Goods, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

JOSEPH SANTARLAS, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

HOYT ARCHERY, INC.; ARCHERY TRADE
ASSOCIATION, INC.; BOWTECH INC.; BPS
DIRECT, LLC d/b/a BASS PRO SHOPS;
CABELA'S LLC; DICK'S SPORTING
GOODS, INC.; JAY'S SPORTS, INC. d/b/a/
JAY'S SPORTING GOODS; KINSEY'S
OUTDOORS, INC.; LANCASTER ARCHERY
SUPPLY, INC.; MATHEWS ARCHERY,
INC.; NEUINTEL LLC d/b/a PRICESPIDER
f/k/a ORIS INTELLIGENCE; PRECISION
SHOOTING EQUIPMENT, INC.;
TRACKSTREET, INC.,

Defendants.

**JOINT MOTION AND STIPULATION
FOR EXTENSION OF TIME TO
RESPOND TO COMPLAINT AND
STAY OF ALL PROCEEDINGS FOR 60
DAYS**

Case No.: 2:25-cv-00436-DAK-DBP

Senior Judge Dale A. Kimball

Chief Magistrate Judge Dustin B. Pead

Plaintiff Joseph Santarlas and Defendants Hoyt Archery, Inc.; Archery Trade Association, Inc.; Bowtech, LLC (named as Bowtech Inc.); BPS Direct, LLC d/b/a Bass Pro Shops; Cabela's LLC; Dick's Sporting Goods, Inc.; Lancaster Archery Supply, Inc.; and Mathews Archery, Inc. (together "Moving Defendants" and with Plaintiff, the "Parties"), through their respective counsel, jointly move for and stipulate to the entry of an order coordinating and extending for approximately 60 days Moving Defendants' deadlines to respond to Plaintiff's Class Action Complaint (ECF No. 1) and staying all proceedings until September 15, 2025. In support, the Parties state as follows:

1. Plaintiff filed the complaint in this matter on May 30, 2025.
2. Plaintiff began service of process on defendants in late June 2025. As a result, deadlines for individual Moving Defendants to respond to the complaint will occur on various dates in late July 2025.
3. Not all defendants have been served. Moving Defendants are all the defendants of whom the Parties are aware that have retained counsel to date.
4. The Parties anticipate that they will coordinate on a uniform deadline for all defendants to respond to the complaint and, if necessary, briefing schedules and related deadlines. The Parties agree that such coordination, and the relief sought in this Motion, is in the interest of all parties and judicial economy.
5. On July 10, 2025, Defendant Mathews Archery, Inc. (Mathews) moved to dismiss the complaint (ECF No. 31). No briefing schedule has been set for that motion.
6. Additionally, since the complaint was filed, five other actions asserting substantially similar allegations and claims have been filed: *Erik Babst v. Archery Trade Association, Inc. et al.*, No. 25-cv-02721 (D. Minn.); *Alex Janochoski v. Hoyt Archery, Inc. et al.*,

No. 25-cv-02788 (D. Minn.); *Hugh Hansen v. Archery Trade Association, Inc. et al.*, No. 25-cv-00779 (M.D. Tenn.); *Gary Dunkin v. Bowtech, LLC et al.*, No. 25-cv-00546 (W.D. Mo.); and *Matt Simcik v. Archery Trade Association, Inc. et al.*, No. 25-cv-02875 (D. Minn.) (the “Minnesota, Missouri, and Tennessee Cases”).

7. Service of process is ongoing in the Minnesota, Missouri, and Tennessee Cases, and the Parties agree that coordination of deadlines for responsive pleadings and related matters with the Minnesota, Missouri, and Tennessee Cases will enhance judicial economy.

8. Plaintiff anticipates that additional cases asserting similar allegations and claims as those made in the complaint will be filed in this District, the United States District Court for the District of Minnesota, and other federal district courts, which will require further coordination.

9. Plaintiff anticipates that a motion to seek coordination of this case with other similar cases will be filed with the United States Judicial Panel on Multidistrict Litigation.

10. The Parties anticipate that, if the United States Judicial Panel on Multidistrict Litigation determines coordination of these cases is appropriate, the cases will be sent to a single venue and a consolidated amended complaint will be filed. The Parties agree that efficiency and judicial economy are served by having Defendants respond to any consolidated amended complaint, instead of piecemeal responses by various defendants to multiple complaints in multiple venues.

11. The Parties seek sixty days in connection with this Motion but anticipate that they may later move the Court for an additional extension of case deadlines including, for example, if any coordination determination by the United States Judicial Panel on Multidistrict Litigation remains outstanding at the end of the requested period or other forms of coordination are required.

The Parties agree that good cause exists to extend the Moving Defendants' deadlines to respond to the complaint and for a stay of any other deadlines in this action. The requested relief will conserve judicial and party resources in this complex, multiparty action pending the resolution of expected coordination proceedings.

The Parties are submitting a proposed order with this motion in accordance with Local Rules 6-2(b) and 7-1(e)(2).

DATED: July 17, 2025.

Respectfully submitted,

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** Signed by filing attorney with
permission.*

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of July, 2025, I caused a true and correct copy of this **JOINT MOTION AND STIPULATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT AND STAY OF ALL PROCEEDINGS FOR 60 DAYS** to be filed with the Court's CM/ECF system, which notified all counsel of record.

/s/ Stephen C. Mouritsen